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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 76.51 of the Commission's Rules to Include Marion, Indiana in the Indianapolis-Bloomington, Indiana Television Market

MM Docket No. 93-260

To: Chief, Mass Media Bureau

CONSOLIDATED REPLY COMMENTS OF MARION T.V., INC.

Marion T.V., Inc., licensee of Station WMCC-TV, Marion, Indiana ("WMCC"), hereby submits this consolidated reply to comments filed in the abovecaptioned proceeding by licensees of two VHF stations, River City License Partnership (WTTV, Bloomington, Indiana) ("WTTV"), and VideoIndiana, Inc. (WTHR-TV), Indianapolis, Indiana) ("WTHR") (jointly, the "Commenters"). Commenters oppose the addition of Marion to the Indianapolis-Bloomington hyphenated television market. None of the UHF stations in the Indianapolis ADI, with which WMCC primarily competes, and no cable operator in the ADI, has objected to the proposal.

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ARGUMENT

The "underlying competitive purpose of the market hyphenation rule [is] to delineate areas where stations can and do both actually and logically compete." Notice of Proposed Rulemaking. In Re amendment to Include Newton, New Jersey and Riverhead, New York in the New York, et al. Television Market, MM Docket No. 93-290, DA93-1349 (Rel. November 16, 1993).

with all of the other stations in the Indianapolis/
Bloomington television market, and that it alone within
the market is unfairly disadvantaged by exclusion from
the market. None of the following basic facts set
forth in WMCC's Petition for Rulemaking in this
proceeding ("Petition") has been challenged by
Commenters:

° WMCC's Grade B coverage of the ADI is comparable to that of the other UHF stations in the market; it is superior to that of the Bloomington UHF stations, WCLJ and WIIB²;

The sole exception is WTTK in Kokomo, which does not place a Grade B contour over either Indianapolis or Bloomington, and which operates as a satellite of WTTV, Indianapolis.

This was demonstrated in WMCC's Petition by an Engineering Statement which analyzed the Grade B coverage of all of the market UHF stations.

- WMCC provides Grade A coverage over Indianapolis and Grade B coverage over Indianapolis' home county, Marion County;
- Three Indianapolis commercial stations place a Grade B contour over Marion and the remaining two place Grade B contours within five miles of Marion -- the two stations that do not cover Marion with a Grade B contour (WHMB and WXIN) also do not cover Bloomington with a Grade B contour -- yet Bloomington stations enjoy hyphenated market status;
- Both Nielsen & Arbition recognize that WMCC competes with Indianapolis and Bloomington television stations.

Despite the fact that they do not dispute these basic facts, Commenters raise a number of questions about the proposal to amend Section 76.51 as proposed:

1. <u>Viewership</u>. Commenters assert that "WMCC-TV does not have viewership in Indianapolis or Bloomington sufficient to demonstrate commonality with the hyphenated market" (WTTV Comments at 5.).

As a preliminary matter, the Commission has never held that viewing level is a prerequisite in designating hyphenated communities in a market. This is presumably

The very fact that Commenters have opposed this proposal suggests a recognition on their part that WMCC is in fact competitive with them for viewers and programming.

due to the fact that the presence or absence of designation is itself a factor that affects a station's viewership. 4

In any event, WMCC is significantly viewed in Indianapolis' home county, Marion County (not to be confused with they City of Marion, located in Grant County). (1993 Cable & Station Coverage Atlas (Warren Publishing, Inc.) at 63). WMCC's viewership in the immediate Indianapolis/Bloomington area market is demonstrably superior to that of at least two stations in the market which presently benefit from hyphenated community status -- WCLJ and WIIB (Bloomington), neither of which is significantly viewed in either Indianapolis, Marion County or in their own home county, Monroe. Id.

The fact that WMCC is significantly viewed in Indianapolis and throughout Marion County but not in Bloomington, is comparable to the viewership situation

For example, the total geographic area in which a station in a non-designated market community may secure syndicated exclusivity rights is more restricted than is that of stations licensed to hyphenated communities in the same market. The result is that duplicative programming aired by the station licensed to a non-designated community in turn makes it less popular than stations with the ability to ensure that their program line-up is not duplicative in a greater portion of the ADI.

WMCC also attains good viewership at least very near to, if not in, Bloomington. The northern edge of Bloomington's home county, Monroe County, is only six miles from Johnson County, in which WMCC is also significantly viewed. <u>Id</u>.

of WHMB, Indianapolis, which likewise is significantly viewed in Indianapolis but not in Bloomington (<u>id</u>.) -- yet WHMB benefits from hyphenated community status, while WMCC does not.

wmcc's viewership throughout the ADI is comparable to that of the Bloomington and Indianapolis UHF stations. Wmcc is significantly viewed in 16 counties within its ADI, equal to or more than every other UHF station in the market save one. (Id. at 62-64). Wmcc garnered a three-share in the July 1993 Nielsen market survey for the Indianapolis DMA. This is superior to the performance of both WHMB, Indianapolis, and WCLJ and WIIB, Bloomington. (See Attachment 1 hereto.) Among in-market stations, WMCC garnered a four-share, again superior to the share of one Indianapolis and two Bloomington stations. (Id.)

Notably, WMCC's share remains the same (and superior to that of three other market stations) in the eight core market counties comprising the Indianapolis "Metropolitan Statistical Area", as defined by the U.S. Census Bureau. (See Attachments 1 and 2 hereto.)

WMCC has a 46 percent "cume" in the DMA, higher

Only WXIN, Channel 59, Indianapolis, is significantly viewed in a greater number of counties. Id.

The terms "share" and "cume" are defined at Attachment 3 hereto.

than that for WIIB and WCLJ, Bloomington, and WHMB, Indianapolis. (See Attachment 4 hereto.)

WMCC's viewership both in Indianapolis and throughout the market is superior to that of three Bloomington/Indianapolis stations. There is no basis for treating WMCC differently from its Bloomington and Indianapolis competitors on the basis of viewership.

2. <u>Distance</u>. Commenters state that Marion is too far from Indianapolis and Bloomington to be included in the Indianapolis/Bloomington market. The city boundaries of Marion and Indianapolis are separated by 42 miles, those of Marion and Bloomington by 100 miles.

(See Engineering Statement included at Attachment 5 hereto.)

All of these figures include cable as well as non-cable homes. The figures are accordingly skewed against WMCC, since Indianapolis and Bloomington stations enjoy greater cable carriage rights within the ADI than does WMCC. For example, by virtue of the fact that Bloomington is a "hyphenated community" within the market, all of the Bloomington stations are automatically entitled to be carried free of charge on cable systems within both the Bloomington and Indianapolis specified zones, regardless of their viewing level in either community. Because Marion is not a hyphenated community, on the other hand, WMCC is automatically entitled to free carriage in the specified zone of only one community -- Marion.

Measuring from "designated reference points", Marion is 60 miles from Indianapolis, and 106 miles from Bloomington. <u>Id</u>. By either measure, the distances are far less than the 72 and 120 mile figures claimed by WTHR in its Comments.

Commenters' sole authority for their claim of impermissible distance is <u>Television Muscle Shoals</u>, 48 RR2d 1191 (1981), erroneously cited for the proposition that "75 miles [is] too great a distance to support redesignation". <u>Television Muscle Shoals</u> stands for nothing of the kind. The decision there not to include Florence in the Huntsville-Decatur, Alabama market was premised on several extremely compelling factors, not one of which is present here. 10

Numerous markets around the country include communities spaced at distances greater than 75 miles. 11 Marion is a comparable distance to Indianapolis and Bloomington as are designated communities to each other within other hyphenated markets; Commenters have offered no justification for denial of the proposal on this ground.

These included the facts that the Florence station's Grade B contour covered <u>neither</u> Huntsville nor Decatur; grant of the request would have resulted in duplicative carriage of a second NBC affiliate by local cable systems; and grant would have imposed additional mandatory carriage obligations under the then-current must-carry rules with respect to cable systems which opposed the request.

For example: Anderson, South Carolina is 90 miles from Asheville, North Carolina; Lincoln, Nebraska is 120 miles from Kearney, Nebraska; Melbourne, Florida (added to the market <u>after</u> the <u>Television Muscle Shoals</u> decision was issued) is nearly 90 miles from Daytona Beach, Florida.

3. Grade B Coverage. Commenters argue that the proposal should be denied because WMCC does not place a Grade B signal over Bloomington. The failure of Commenters to advance any authority for the proposition that each hyphenated community of a market must provide Grade B coverage over every other hyphenated community of the market might be explained by the fact that two of the stations within WTHR's own community of license (WHMB and WXIN, Indianapolis) fail to provide Grade B coverage over Bloomington.

Similar configurations exist in markets around the country. 12 Indeed, when the Commission adopted its initial list of hyphenated markets, it specifically recognized that "portions of the market are occasionally located beyond the Grade B contours of some market station[s] (sic)". Cable Television Report and Order, 36 FCC2d 143, 176 (1972). 13

Market No. 25: KCMY, Sacramento--Grade B does not cover Modesto; Market No. 37: WZZM, Grand Rapids --Grade B does not cover Kalamazoo or Battle Creek; Market No. 46: WGGS, Greenville -- Grade B does not cover Asheville; Market No. 55: WBSF, Melbourne --Grade B does not cover Daytona Beach; Market No. 64: WCIA, Champaign -- Grade B does not cover Springfield. 1993 Television and Cable Factbook (Warren Publishing, Inc.)

WTTV misleadingly claims that only seven of 14 stations in the Indianapolis ADI place a Grade B signal over Marion. These figures include noncommercial UHF stations licensed to Bloomington, Indianapolis, South Bend and Muncie. Not only are noncommercial stations irrelevant in hyphenated market designations, but none [Footnote continued on next page]

In short, Grade B coverage over Bloomington is not a prerequisite to grant of this proposal. Given the absence of reciprocal Grade B coverage over Bloomington by existing Indianapolis stations, insistence upon blanket Grade B coverage by WMCC would simply perpetuate the existing inequalities in the market.

- 4. Alternatives. Without analysis, Commenters suggest that Marion should be included in the Fort Wayne market. WMCC is unaware of, and Commenters have not pointed to, any instances in which a station assigned to one ADI has been designated a community of a hyphenated television market assigned to a different ADI. WMCC does not provide Grade B coverage over Fort Wayne, and none of the four Fort Wayne commercial television stations places a Grade B signal over Marion. There is no basis for inclusion of Marion in the Fort Wayne television market.
- 5. <u>Public Interest/Private Need</u>. Commenters question whether the record demonstrates that a grant of the proposal in this proceeding would be in WMCC's and the public's interest.

[[]Footnote continued from previous page] of the noncommercial stations referred to provides coverage over <u>both</u> Bloomington and Indianapolis (and at least one provides Grade B coverage over neither), despite the fact that both communities benefit from designated market status.

In its Petition WMCC clearly described the disadvantages to which improper exclusion from the market subjects it. These are in any event self-evident. As noted previously herein, each of WMCC's competitors in the market, by virtue of the fact that their respective communities of license are hyphenated communities in Section 76.51 of the Rules, is automatically entitled to carriage free of charge on cable systems within the specified zone of two communities (Indianapolis and Bloomington), as well as in any other communities in which they happen to be significantly viewed. WMCC enjoys such an automatic entitlement only with respect to cable systems within an area one-half as large, the specified zone of one community -- Marion. 14

which can secure exclusivity rights within the specified zone of one community, Marion) than is each of its competitors, which can secure exclusivity rights within the specified zones of two communities (Bloomington and Indianapolis), a protected exclusivity area twice as large as that to which WMCC is entitled.

While WMCC is presently entitled to cable carriage free of charge on cable systems in Indianapolis by virtue of its significantly viewed status there, this is a status that WMCC had to earn through effort and investment -- and one that could theoretically be lost in the future.

Disparate and disadvantageous treatment of a market station vis a vis its competitors is manifestly not in the public interest. The inequitable situation in the Indianapolis market has direct consequences for viewers in the market. For example, presently WMCC cannot, under the non-network territorial exclusivity rule, even attempt to secure exclusive rights to programming that syndicators choose also to sell to stations in Indianapolis, despite the fact that WMCC provides Grade A service to, and is significantly viewed in, Indianapolis. If Marion were a designated community in the Indianapolis market, WMCC would have the right to negotiate with syndicators to ensure that Indianapolis stations not air programming duplicated on WMCC, with the result that Indianapolis viewers would be assured of a wider selection of unduplicated programming.

The detriment both to WMCC and to the public through inequitable treatment within the marketplace are self-evident and amply supported by the record.

6. <u>Carriage Rights</u>. Finally, Commenters claim that redesignation "could afford the station mandatory carriage rights well beyond its Grade B contour, on cable systems far distant and in cable communities where WMCC is not significantly viewed." (WTTV Comments at 6.)

However, mandatory carriage rights are not determined on the basis of Grade B coverage and significant viewing. Congress has already determined that WMCC is entitled to mandatory carriage on cable systems throughout the ADI. 15 WMCC is not seeking to acquire new mandatory carriage rights -- it is seeking parity under FCC rules so that it may give effect to its existing rights on a level playing field with its competitors. 16

Similarly, there is no basis, as suggested by Commenters, for the Commission to hold the Petition in abeyance until conclusion of a pending proceeding by the U.S. Copyright Office relative to the copyright effect of amendments to Section 76.51. The Commission is required to ensure that 76.51 accurately reflects the competitive situation of all television stations within a given market. The question of what copyright treatment the Copyright Office might choose in the future to afford to 76.51 amendments is irrelevant to whether those amendments should properly be made in the

It bears repeating that not a single cable system within the ADI has objected to grant of the proposal.

Commenters' suggestion that WMCC is somehow less deserving of cable carriage throughout its ADI than other stations in the market is particularly unpersuasive in light of the fact that WMCC provides coverage of its ADI, and attains viewership levels there, comparable to or better than those of the majority of the other UHF stations in the ADI.

first instance, under accepted standards of federal communications law and policy.

CONCLUSION

WHEREFORE, for the reasons set forth in WMCC's Petition and herein, WMCC respectfully requests that Section 76.51 of the Commission's rules be amended to add Marion to the Indianapolis-Bloomington hyphenated market.

Respectfully submitted,
MARION T.V., Inc.

Reed Miller

Marcia Cranberg ARNOLD & PORTER

1200 New Hampshire Ave., N.W.

Washington, D.C. 20036

(202) 872-6700

Date: November 19, 1993

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#1=LOUISVILLE #2=LAFAYETTE, IN #3=TERRE HAUTE

401

JULY 8 - AUGUST 4, 1993

IN TAB

CABLETY

	TABLE 1	- UNIVERSE I	STIMATE	S - JAN. 19	993	
	TOTAL	TV	TV HO	Y COUNTY S	IZE †	
AREA	HOUSEHOLDS	HOUSEHOLDS	A	В	C	D
METRO DMA % NSI %	494,300 908,500 1,174,600	488,360 895,790 100 1,157,150 100		488,360 55 488,360 42	221.080 25 374,770 32	186.350 21 294.020 25

TOTAL HOUSEHOLDS are estimated by Market Statistics (MS), used by special permission of that organization. They are the base against which television ownership percentages have been applied. TELEVISION OWNERSHIP PERCENTS are Nielsen estimates based on combining historical projections from the 1960 and 1970 Censuses with estimates from the NSI telephone interviews from a number of all market measurement periods.

number of all market measurement periods.

HOUSEHOLDS ARE OCCUPIED HOUSING UNITS. The household universe estimates shown in Table 1 are estimates of year-round households, i.e. housing units occupied year round. Seasonal housing units which are occupied only during certain seasons of the year are not included in the Household Universe Estimates. Thus, the number of households during the survey period may differ from the estimate in Table 1.

† See NSI Reference Supplement for definition of county size.

LT Less than 1%

TABLE 2 - PENETRATION ESTIMATES

	PERCENT OF TV HOUSEHOLDS								
AREA	BLACK	HISPANIC	MULTI-SET	CABLE TV	VCR				
METRO DMA	13 8	1	71	62 61	80				

Multi-set estimates are based on the metered sample. Multi-set, Cable TV and VCR estimates are based on the latest available data. Black and Hispanic estimates are as of January 1, 1993. See NSI Reference Supplement for detail.

TABLE 3 - SAMPLE SIZES: HOUSEHOLDS

		DIARY SAMPLE(1)										
AREA			LLY DESIGN		IN-TAB DIARY HOUSEHOLDS							
	METER SAMPLE IN-TAB AVG.	LISTED	UNLISTED	TOTAL	LISTED	UNLISTED	TOTAL					
METRO DMA(INCL.METRO) NON-DMA NSI(INCL. DMA)	197 (EST'D) 370 (2) 370	745 1402 1000 2402	360 596 366 962	1105 1998 1366 3364	340 662 480 1142	91 166 126 292	431 828 606(3) 1434					

(1) The Non-DMA (Diary) sample is combined with the DMA meter sample for compiling Station Total households; the entire diary sample is used for Audience Composition data.

|2| Yields an approximate equivalent simple random sample size of 722.
|2| + (3) NSI Area Station Total households herein are based on these in-tab samples and yield an approximate equivalent simple random sample size of 983.

Equivalent simple random sample size is a term sometimes used for the statistical equivalent of the sample size for computing sampling errors or statistical tolerances.

For sample selection procedures in Total Telephone Frame markets, see NSI Reference Supplement.

TABLE 4 - TELEVISION STATIONS

			J110
CITY OF ORIGIN	STATION	CHANNEL	AFFILIATION
BLOOMINGTON INDIAMAPOLIS CHICAGO ATLAMA CABLE CABLE CABLE CABLE CABLE CABLE CABLE CABLE	WCUJUMNEN WISH WISH WISH WISH WISH WISH WISH WISH	42 20 40 40 8 8 60 13 30 20 20 50 8 13 7	TELLITE OF WITV

(L) THIS LOCAL STATION IS REPORTABLE IN THE DAYPART SECTION ONLY (D) THIS OUTSIDE STATION IS REPORTABLE IN THE DAYPART SECTION ONLY

BLOOMINGTON

WIIB

63

TABLE 5 - TV HOUSEHOLDS AND IN-TAB DIARY HOUSEHOLDS BY SAMPLING AREA ECT TV

ADJ DMA		MRS TERRI-	HHLDS	HHLDS %	CNTY	DIARY	
#3 #3 #1 #1 #1 #3	VERMILION D BARTHOLOMEW D BENTON D BLACKFORD MD BOONE D BROWN D CARROLL C CARROLL D CASS CLAY D CLINTON D DECATUR D DELAWARE D FAYETTE D FOUNTAIN D GRANT GREENE MD HAMILTON MD HANOCCK MD HENDRICKS D HENRY D HOWARD JACKSON JAY D HOWARD JACKSON JAY D HOWARD JACKSON D JEFFERSON D JEFFERSON D JEFFERSON D JEFFERSON D JENNINGS MD JOHNSON KNOX C LAWRENCE D MADISON MD MARION D MIAMI D MIAMI D MONTGOMERY MD MORGAN	TERRITORY WCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCC	HHLOS JAN. 1993 33.110 24.300 3.470 5.270 14.370 5.490 7.110 14.580 9.260 11.660 14.640 27.130 11.930 16.460 26.700 18.110 30.920 18.110 30.920 18.100 39.240 14.900 16.140 39.2540 39.240 13.080	HHLDS % JULY 1993 74 65 47 73 46 62 49 57 41 68 62 46 65 36 73 78 79 77 74 45 66 65 66 65 66 65 68 62 40	SIZE† CCCDDBBDDDCCDDCCDBBBBBDCCDDDCBBDDCCBDCCBBDCCDBBDDCCBDCCBBDCCABBCCBBCABBCCBBCABBCCBBCABBCCBBCABBCCBBCABBCCABBCCBBCABBCCBBCABBCCABBCCBBCABBCCABACABACABACABACABCAB	DIARY HHLDS 60 25 1 4 12 29 17 7 37 6 6 6 32 20 30 16 30 17 17 17 17 17 17 17 17 17 17 17 17 17	
#1 #3	D MÖNROE D MONTGOMERY MD MORGAN ORANGE D OWEN PARKE D PUTNAM D RANDOLPH	IN EC IN EC IN EC IN EC IN EC IN EC IN EC	39,240 13,080 19,400 6,750 6,750 5,720 9,880 10,100	58 62 40 46 31 53 36 48	D B D D D D	32 15 15 8 6 7 10 13	
#1 #2 #3 #3	RIPLEY D RUSH SCOTT MD SHELBY TIPPECANOE D TIPTON VERMILLION VIGO WABASH D WARREN	IN EC IN EC IN EC IN EC IN EC IN EC IN EC IN EC	8,840 6,310 7,690 14,750 45,770 5,930 6,530 38,620 12,510 2,960	34 41 47 80 46 68 76 52 28	00080000000	9 6 9 17 225 5 15 94 21	
METRO TOTAL DMA TOTAL NSI AREA TOT #1 = LOUISVI #3 = TERRE H	WAYNE D WHITE	IN EC IN EC	26,930 9,020 488,360 895,790 1,157,150 LAFAYETTE	62 74 62 61 62	C D	34 10 431 828 1,434	

#3 = TERRE HAUTE
NOTE: VIEWING IN ADJACENT DMA'S IS NOT LIMITED TO NSI AREA COUNTIES IN
TABLE 5. THE ABOVE LIST OF COUNTIES DOES NOT NECESSARILY REPRESENT
ENTIRE AREA FOR WHICH VIEWING OCCURS TO STATIONS IN THIS MARKET.
SEE INSIDE BACK COVER FOR FURTHER STATION TOTAL AREA DESCRIPTION.

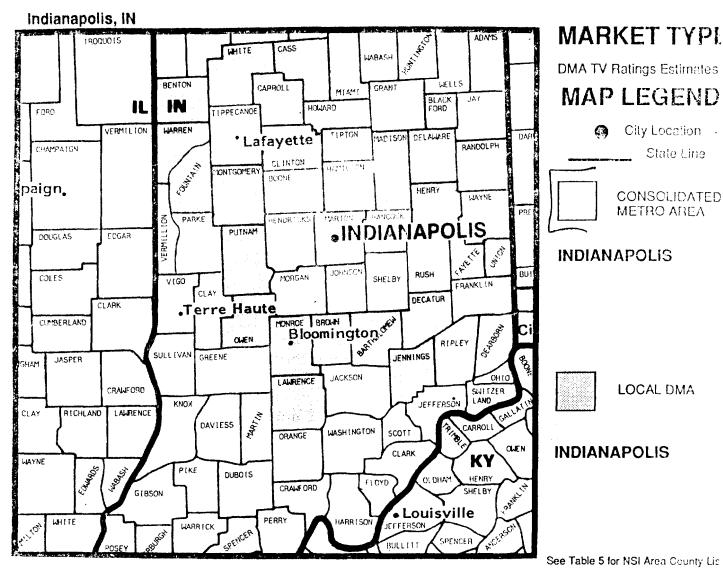
initially, approximately 51% of the predesignated indianapolis DMA basic meter sample households are recruited and installed. For a typical report period, approximately 39% of the installed meter sample are predesignated households.

^{* =} NSI Client 1 = Independent Station IF = Independent-Fox Network Affiliate I-S = Independent-Subscription TV Station T = Turner Broadcasting System P = Educational and Public Broadcasting Service Stations P-C = Public Broadcasting-Commercial Network affiliation as shown herein is based on information supplied by the networks for use in Nielsen Television Index (NTI). For additional details, see the NSI Reference Supplement.

Audience estimales are computed separately for each week. Reported multi-week averages are the average of the appropriate individual week audience estimates. Some of the above counties may have been combined for projecting individual week audience estimates. Viewing among the households in the in-tab sample for all counties that are combined are projected to the Total TV Households for the combined counties. These county groupings are available upon request.

** The DMA meter sample currently approximates 404 television households in which meter equipment is installed; 404 households (including households replaced during the survey period) provided records meeting Nielsen accuracy standards during one or more days of this survey interval, including 370 households on the average individual day.

[†] See NSI Reference Supplement for explanation of MRS Territory and County Size.



THE NSI® TECHNIQUE

INTRODUCTION

NSI techniques and procedures used in compiling the audience estimates in this Viewers in Profile* (VIP*) are described in the current edition of the NSI Reference Supplement. The user should refer to the Supplement for information regarding the sample plan, data reported, examples of standard error calculations, as well as for additional detail on other related topics including those treated briefly below.

The use of mathematical terms to express the audience estimates herein should not be regarded as a representation by Nielsen that they are exact to the precise mathematical values stated.

I THIS NSI ANALYSIS PROVIDES THE FOLLOWING **AUDIENCE ESTIMATES:**

WEEKLY CUMULATIVE ANDIENCES (Net Reach) - By Daypart

- DMA Households: the total number of different TV households reached one or more quarterhours for the average week and for the 4 weeks of the current measurement period. Cumulative audience percentages for households are based on Meter records only.
- Station Total Households: Weekly cumulative audience reported in thousands of households is for the average week of the latest all-market measurement period (Nov., Feb., or May) as well as July

AVERAGE QUARTER HOUR AUDIENCES - By Daypart and/or By Quarter-Hour or Half-Hour

- HUT (Households-Using-Television): television households in the Metro/DMA Area with a TV set turned on as a percentage of Metro/DMA Area TV households.
- PUT (Persons-Using-Television): persons in television households in the DMA that are viewing any station as a percentage of persons in DMA television households.
- Metro/DMA Area Rating: television households in the Metro/DMA Area tuned to a specific station as a percent of the Metro/DMA Area TV households. DMA ratings are also shown for selected persons categories.
- Metro/DMA Area Share: television households in the Metro/DMA Area tuned to a specific station as a percent of the Metro/DMA Area TV households with a set turned on.
- DMA In-Market Share: an estimate of the DMA household 4-week share of viewing received by a local commercial station in comparison to the other local commercial stations in the market. This estimate is only reported in the Daypart Section.
- Trend Guide Data: DMA HUT and Shares are provided for the a) Daypart and Time Period Sections where dath are based on the same Daypart/Time Period for the indicated measurement periods (see column headings) and b) Program Audience Averages Section where data are recomputed based on the "normal" program time period in the current VIP for the ingreated measurement periods (see column headings).
- Users are reminded that Trend Guide data are subject to varietions due to several factors, such as campling error and consonal variations in television viewing. These factors, as well

- other considerations outlined in Section IV of this VIP should be recognized in using as comparing data from several measurement periods.
- Station Total Audience: total U.S. TV households reached
- Percent Distribution of Station Total Households: When Station Total Households are report able in the Home market they are also shown distributed on a percentage begins between the Home Metro area, the Home DMA and up to three selected adjacent DMA's. Where appliable, ratings are also shown for the adjacent DMA's. These data are reported for all displacent DMA's. during all-DMA measurement cycles only.
- Audience Composition: in numbers of persons viewing and their distribution by it demographic categories shown reported in terms of DMA Ratings and/or Projected Tet-
- Time Period Section: Audience estimates are shown (a) as 4-week averaged for shown on the cover (exclusions due to special events or other unusual areas of these, any, are listed on Page 3), and (b) as program time period estimates excluding a reason before if any. Such "pure" program audience estimates are reported for local of plants only
- Adjacent Quarter-Hour (1/2 hour) Averages: The average of data for the commit of after hoo and the previous quarter-hour, reported for each time period break. Shown are 2001 reported for each time period break. Shown are 2001 reported for ratings plus Station Totals for households and selected demographic categories.
- DMA Weekly Ratings: DMA Household audiences reported for each wook of the incapure ment on a program average time period basis.
- Program Audience Average Section: A retabulation of the program auditor of procledior preemptions where applicable). For a description of the rules and procedures for averaging audience data for this section, see the NSI Reference Supplement
- Persons Share Section: Persons in the DMA tuned to a specific station as a per-DMA Persons-Using Television (PUT) for this survey interval and three prior intervals
- TV Households and Persons Trend Section: Households Using Television And Flags of Persons Using Television (PUT) are trended for all-DMA measurement periods for this period and four prior years. Rating and Share data are summarized for local common out stations.

To avoid the implication that the reported averages represent normal operating model in a taitimes, a section on "Operating Notes" is included showing dates and times of a moderating conditions as reported by the stations.

II AREAS MEASURED

Metro Area: the Metro Area is the Metropolitan Statistical Area (MSA) as deof their population in the Metro Area, In the absence of an established Mcfm I have a well-before in Nielsen's judgment a Metro Area may not the absence of an established Mcfm I have a way not the absence of a metro Area way not the absence of an established Mcfm I have a way not the absence of a metro Area way not the absence of a metr in Nielcen's judgment a Metro Area may not represent the TV market(s) so with the a group of TV stations, a group of counties may be substituted to serve this purpose. Such to exact is the (Continued on things Prick Cost

SECTION A.I.A.

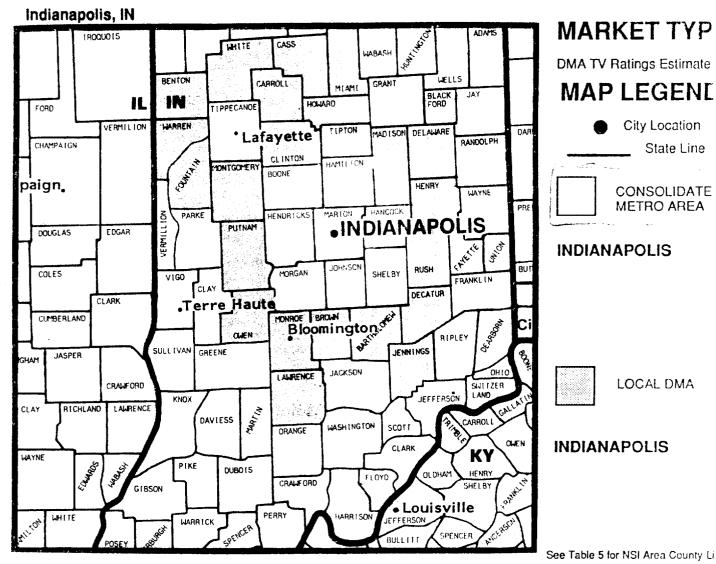
AREAS MEASURED AND REPORTED

NSI reports data on various areas in each of the more than 200 television markets in the U.S. Depending on the type of VIP reporting, as described in Section C.I.D., the areas measured and reported are as follows:

- 1. METRO AREA: The Metro Area is the Metropolitan Statistical Area (MSA) or the Primary Metropolitan Statistical Area (PMSA) as defined by the Office of Management and Budget brought to county line basis to include counties having over 50% of their population in the Metro Area. A Metro Area may consist of a combination of two or more PMSA's in cases where there are two or more metropolitan areas being served jointly by TV stations originating in the TV market; e.g., Dallas-Ft. Worth. In the absence of an established Metro Area, or where, in Nielsen's judgment, a Metro Area may not represent the TV market(s) served by a group of TV stations, a group of counties may be substituted to serve this purpose. Such an area is titled Central Area and is so delineated on the market map. Counties comprising the Central Area will include home county of the originating TV station(s) for the market plus other neighboring counties which are, in general, considered a part of the population nucleus that is served by the TV station(s) originating in the TV market. For text purposes, the terms Metro and Central are interchangeable.
- 2. NSI AREA: Comprises the Metro Area and/or DMA (if any) and additional counties targeted typically to include, per Nielsen estimates, approximately 95% of the average quarter-hour U.S. audiences to stations reportable and assigned as local to the NSI market. In general, NSI Area assessments are made each Spring, based on the prior year's information. Based on these assessments, NSI Areas are either verified or modified for subsequent measurements. In this manner, NSI is able to reflect audience changes which may have resulted from changes in antenna, channel, power, programming and the like.
 - In a few cases due to unusual geographic or signal constraints (Cable, etc.), an NSI Area may be targeted below 95%. In those cases where a market falls significantly below 95%, a special notation will appear in the VIP citing the specific NSI Area percentage. Markets falling only marginally below 95% will simply have their NSI Area percentages reduced to the appropriate level. It is important to remember even though an NSI Area may be targeted below 95%, the intent is to include all viewing to the station, including viewing from outside the NSI Area.
- 3. STATION TOTAL AREA: Station total audiences are based on viewing data obtained from counties, both within and outside a station's NSI Area. Although the counties specified for a market's NSI Area typically account for virtually 95% or more of the average quarter-hour audience to a station, viewing outside the NSI Area is also added to each station's total audience. To accommodate the needs of the marketplace and maintain a competitive delivery schedule, Station Totals (as defined in this paragraph and other NSI materials) for superstations may be based on a different geography. However, a Special Report reflecting a superstation's complete Station Totals may be produced for the affected station/market.

During the three all-market measurement (sync) periods, plus the July all-DMA measurement period, areas beyond a station's NSI Area are searched for viewing to that station and those audiences are included as part of the station's total audiences. The outer search areas always include those counties from which a station was viewed in prior measurement periods, whether the viewing was done from an over-the-air signal, terrestrial cable or satellite cable. Following each of the all-market measurement periods, total viewing to all U.S. stations is examined to determine additional outer search areas required to report a station's total audience. In rare instances it may be necessary to schedule production of a market's VIP at a later time in the production sequence in order to include all audience to one or more stations in that market. In the event such delay in production scheduling is impractical, especially for Superstation station total audiences whose wide distribution of audience may not be included in total, a special notation is placed on page 1 or page 3 to that effect in the market's VIP.

During non-sync intervals, audience beyond an NSI Area is added directly to a station's total audience when counties are measured concurrently. Audience from non-measured counties beyond the NSI Area is ratio-estimated based on viewing from the previous November, February or May measurement (whichever is most recent) and viewing in the counties included in the current measurement. Ratios are computed by Daypart and are applied to a station's quarter-hour audience within a daypart; e.g., if during a sync interval



THE NSI® TECHNIQUE

INTRODUCTION

NSI techniques and procedures used in compiling the audience estimates in this Viewers in Profile" (VIP®) are described in the current edition of the NSI Reference Supplement. The user should refer to the Supplement for information regarding the sample plan, data reported, examples of standard error calculations, as well as for additional detail on other related topics including those treated briefly below.

The use of mathematical terms to express the audience estimates herein should not be regarded as a representation by Nielsen that they are exact to the precise mathematical values stated. I THIS NSI ANALYSIS PROVIDES THE FOLLOWING **AUDIENCE ESTIMATES:**

WEEKLY CUMULATIVE AUDIENCES (Net Reach) — By Daypart

- DMA Households: the total number of different TV households reached one or more quarterhours for the average week and for the 4 weeks of the current measurement period. Curnilative audience percentages for households are based on Meter records only
- Station Total Households: Weekly cumulative audience reported in thousands of households is for the average week of the latest all-market measurement period (Nov., Feb., or May) as well as July

AVERAGE QUARTER-HOUR AUDIENCES - By Daypart and/or By Quarter-Hour or Half Hour HUT (Households-Using-Television): television households in the Metro/DMA Area with a

- TV set turned on as a percentage of Metro/DMA Area TV households. PUT (Persons-Using-Television): persons in television households in the OMA that are viewing any station as a percentage of persons in DMA television households.
- Metro/DMA Area Rating: television households in the Metro/DMA Area tuned to a specific station as a percent of the Metro/DMA Area TV households. DMA ratings are also shown for selected persons categories.
- Metro/DMA Area Share: television households in the Metro/DMA Area tuned to a specific station as a percent of the Metro/DMA Area TV households with a set tuned too.
- DMA In-Market Share: an estimate of the DMA household 4-week share of whom a renerved by a local commercial station in comparison to the other local commercial stations in the market. This estimate is only reported in the Daypart Section.
- Trend Guide Data: DMA HUT and Shares are provided for the a) Daypart and 1 the Period Sections where data are based on the same Daypart/Time Period for the indirectors. ment periods (see column headings) and b) Program Audience Averages Section where data are recomputed based on the "normal" program time period in the current "in for the indicated measurement periods (see column headings).
- Users are reminded that Trend Guide data are subject to variations due to several factors. such as sampling error and seasonal variations in television viewing. These factors, as well

- other considerations outlined in Section IV of this VIP should be recognized in using a comparing data from several measurement periods.
- Station Total Audience: total U.S. TV households reached.
 - Percent Distribution of Station Total Households: When Station Total Households are repo able in the Home market they are also shown distributed on a percentage basis began the Home Metro area, the Home DMA and up to three selected adjacent DMA's. Where app able, ratings are also shown for the adjacent DMA's. These data are reported for all daypa during all-DMA measurement cycles only.
- Audience Composition: in numbers of persons viewing and their distribution by demographic categories shown reported in terms of DMA Ratings and/or Projected χ Persons reached.
- Time Period Section: Audience estimates are shown (a) as 4-week averages for the day shown on the cover (exclusions due to special events or other unusual argumatarises). any, are listed on Page 3), and (b) as program time period estimates excluding pred tion. if any. Such "pure" program audience estimates are reported for local stations on γ
- Adjacent Quarter-Hour (1/2 hour) Averages: The average of data for the current quarter and and the previous quarter-hour, reported for each time period break. Shown are CMA housest ratings plus Station Totals for households and selected demographic categories.
- DMA Weekly Ratings: DMA Household audiences reported for each week of the measure ment on a program average time period basis.
- Program Audience Average Section: A retabulation of the program audiences (excludipreemptions where applicable). For a description of the rules and procedures for average audience data for this section, see the NSI Reference Supplement
- Persons Share Section: Persons in the DMA tuned to a specific station as a percent of DMA Persons-Using Television (PUT) for this survey interval and three prior intervals.
- TV Households and Persons Trend Section: Households Using Talevision (GET) and Person Using Television (PUT) are trended for all-DMA measurement periods for this period a four prior years. Rating and Share data are summarized for local commercial stations.

To avoid the implication that the reported averages represent normal operating conditions at times, a section on "Operating Notes" is included showing dates and times of on usual report conditions as reported by the stations

II AREAS MEASURED

Metro Area: the Metro Area is the Metropolitan Statistical Area (MSA) as defined by the Office of Management and Budget brought to county line basis to include countries among over Scientific population in the Metro Area. In the absence of an established Metro Area, or who in Nielsen's judgment a Metro Area may not represent the TV market(s) so and by a group TV stations, a group of counties may be substituted to serve this purpose 1. In an area is to (Continued conducted Back Continued to the Back Continued to

	WEEKLY CUME	DAYPART		סכ	Deo	NIS I				STA VON		NT	ATO	LS	(000)		ΛEN			TEE	NS	CHI	ĹΓ
HH ST	TAL	TIME	нн	2	RSO.	12- 24	18	12- 24	18- 34	18- 49	25- 49	25- 54	50	W	18	18-	18-	25- 49	25- 54	10	GIRLS		6.
AVG 4 H WK WK (00	001	STATION	58	+ 59	+ 60	24 61	+ 65	24 66	34 67	49 68	49 69	54 70	72	Ğ. 73	74	75	49 76	78	79	17 B1	82	11 63	84
3 8	30 362 155 118 118 408 52 23 810 61 641 661	SUNSAT. 9:00A- MID. WCLJ WFYI WHMB WIPB WISH WMCC WRTV WTBU WTHR WTIU WTIU	1 10 2 2 73 11 64 << 44 1 45 35	10 1 1 93 10 87 61 1 68 52	7 1 1 83 9 75 53 1 44 38	1 9 10 13 15	53 5 47 32 25	6 1 6 7	12 1 11 8 9	25 22 22 17 16 18	2 21 2 19 14 13	2 24 2 23 16 15	28 33 25 15	16 1 17 11 8 11	30 48 28 21 19	6 1 6 7 6 8	14 1 12 12 12 12	1 12 1 10 10	14 13 13 11	4 1 4 5	2 2 3 4 4	3 6 1 7 3 16 6	
37 53 3 177 34 1 12 19 84 94 8 84 94 8 87 96 3 8 87 95 91 8 5 81 8 75 91 8 68 81 8 75 91 8 68 81 8 75 91 8 75		WGN WTBS AEN CNN DSC FAM LIF MTV NIK TNT USA H/P/T.*	289	383	311	59	190	35	53	103	84	97	88	66	121	35	67	56	64	29	16	43	7
3 9 38 54	32 368 166	WCLJ WEYI	1 9	9	6	1	4		1	2	2	2	2	1	2		1	1	1			3	
18 36 12 19 85 94 88 64	166 119 826 425	MICH MILE MILE	2 66 10	1 83 9	1 1 74 8	8	47 4	5 1	11 1	22 2	20 2	22 2	25 3	14	27 3	6 1	13	11	13	4	2	5 1	
3 8 8	23 817	WMCC WRTV WTBU WTHR	59 42	78 57	67 50	8	42 30	5	9	20 16	17 13	20 16	14	15	25 19	6	11	9	12	4	2	6	
5 8 76 91 8	63 849 668	WTIU WTTV+ WXIN WGN WTBS AEN CNN DSC FAM LIF MTV	1 41 32	62 46	38 33	12 13	22 19	6 8	8 9	14 16	12	13	8 3	7 10	16 14	5 7	11	99	10 10	8 6	4 4	16 7	
25 38 26 43 34 49		NIK TNT USA H/P/T.*	266	346	278	53	171	31	47	92	76	87	78	60	108	31	60	50	57	27	15	41	:
3 9 38 54 19 38 154 19 38 154 19 38 155 19 15 19 15 19 15 19 15 15 15 15 15 15 15 15 15 15 15 15 15		6:00A- 6:00A WCLJ WHMB WIPB WIPB WISH WMCC WRTV WTBU WTTV+ WXIN WGTV+ WXIN WGBS AEN CNN DSC FAM LIF MTV NIK TNT USA		5.0					D	AT	Ά	NO	DT	A	/AI								

For explanation of symbols, see page 3.

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JULY 8 - AUGUST 4, 1993

	TABLE 1	- UNIVERSE ES	TIMATE	S - JAN. 19	393	
*	TOTAL	TV	TV HC	USEHOLDS E	Y COUNTY S	SIZE †
AREA	HOUSEHOLDS	HOUSEHOLDS	A	В	c	D
METRO DMA	494 300 908,500	488.360 895.790		488.360	221,080	186.350
3,0	500,500	100		55	25	21
NSI °°	1.174.600	1,157,150 100		488,360 42	374,770 32	294.020 25

TOTAL HOUSEHOLDS are estimated by Markel Statistics (MS), used by special permission of that organization. They are the base against which television ownership percentages have been applied. TELEVISION OWNERSHIP PERCENTS are Nielsen estimates based on combining historical projections from the 1960 and 1970 Censuses with estimates from the NSI telephone interviews from a number of all market measurement periods.

HOUSEHOLDS ARE OCCUPIED HOUSING UNITS. The household universe estimates shown in Table 1 are estimates of year-round households, i.e. housing units occupied year round. Seasonal housing units which are occupied only during certain seasons of the year are not included in the Household Universe Estimates. Thus, the number of households during the survey period may differ from the estimate in Table 1.

† See NSI Reference Supplement for definition of county size.

LT Less than 1%

TABLE 2 - PENETRATION ESTIMATES

		PERCEN	IT OF TV HOUS	EHOLD\$	
AREA	BLACK	HISPANIC	MULTI-SET	CABLE TV	VCR
METRO DMA	13 8	1	71	52 61	80

Multi-set estimates are based on the metered sample. Multi-set, Cable TV and VCR estimates are based on the latest available data. Black and Hispanic estimates are as of January 1, 1993. See NSI Reference Supplement for detail.

TABLE 3 - SAMPLE SIZES: HOUSEHOLDS

		DIARY SAMPLE(1)										
AREA			LLY DESIGN		IN-TAB DIARY HOUSEHOLDS							
	METER SAMPLE IN-TAB AVG.	LISTED	UNLISTED	TOTAL	LISTED	UNLISTED	TOTAL					
METRO DMA(INCL.METRO) NON-DMA NSI(INCL. DMA)	197 (EST'D) 370 (2) 370	745 1402 1000 2402	360 596 366 962	1105 1998 1366 3364	340 662 480 1142	91 166 126 292	431 828 606(3) 1434					

(1) The Non-DMA (Diary) sample is combined with the CMA meter sample for compiling Station Total households; the entire diary sample is used for Audience Composition data.

(2) Yields an approximate equivalent simple random sample size of 722.
 (2) + (3) NSI Area Station Total households herein are based on these in-tab samples and yield an approximate equivalent simple random sample size of 983.

Equivalent simple random sample size is a term sometimes used for the statistical equivalent of the sample size for computing sampling errors or statistical tolerances.

For sample salection procedures in Total Telephone Frame markets, see NSI Reference Supplement.

TABLE 4 - TELEVISION STATIONS

CITY OF ORIGIN	STATION	CHANNEL	AFFILIATION
BLOOMINGTON INGIANAPOLIS INGIANAPOLIS MUNCIE INDIANAPOLIS MUNCIE INDIANAPOLIS INGIANAPOLIS INGIANAPOLIS INGIANAPOLIS INGIANAPOLIS BLOOMINGTON BLOOMINGTON KOKOM	WCLJ (L) *WFYI WHMB WIPB WISH *WCC *WRTV WTBU (L) *WTTV *WTTV *WTTV	42 20 40 49 23 6 69 13 30 4	I P P C I I P C I I I I I I I I I I I I
INDIAMAPOLIS CHICAGO ATLANTA CABLE	*WIN D D D D D D D D D D D D D D D D D D D	29 SA 59 9 17	i F

(L) THIS LOCAL STATION IS REPORTABLE IN THE DAYPART SECTION ONLY (D) THIS OUTSIDE STATION IS REPORTABLE IN THE DAYPART SECTION ONLY ADDITION TO THE REPORTABLE STATIONS SHOWN ABOVE. THE FOLLOW-STATIONS ORIGINATE IN OR ARE ASSIGNED FOR REPORTING PURPOSES THIS MARKET BUT DID NOT MEET THE MINIMUM REPORTING STAMDARDS THE REPORTING STANDARDS, INSIDE BACK COVER)

1

BLOOMINGTON WIIB 63 TABLE 5 - TV HOUSEHOLDS AND IN-TAB DIARY HOUSEHOLDS BY SAMPLING AREA

ADJ		MRS	EST. TV	CABLE TV		IN-TAB
DMA		TERRI-	HHLDS	HHLDS %	CNTY	DIARY
CNTY	COUNTY & STATE	TORY	JAN. 1993	JULY 1993	SIZET	HHLDS
<u>CNTY</u>	COUNTY & STATE VERMILION D BARTHOLOMEW D BENTON D BLACKFORD MO BOONE D BROWN C CARROLL C CAY C CLINTON D DECATUR D DELAWARE D FAVETTE D FOUNTATN D GRANT	TOR WEEGCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCC	33,110 24,300 3,470 5,270 14,370 5,420 7,110 14,580 9,260 11,660 8,440 9,770 6,710 6,710 27,130	74 65 47 73 48 28 50 62 49 57 41 68 62 46 65	SIZE† CC000B00000000000000000000000000000000	60 25 1 4 12 3 6 12 29 17 7 37 6
#3	GREENE MD HAMILTON MD HANCOCK MD HENDRICKS D HENRY D HOWARD	IN HEEC COCC	11,930 42,080 16,460 26,700 18,110 30,920	36 73 58 57 59 77	B B B D C	32 20 30 16 30 17 37
#1	JACKSON	IN EC	14,000	54	Ď	17
#1	JAY JEFFERSON D JENNINGS MD JOHNSON	IN EC IN EC IN EC IN EC	7.870 10.930 8.340 32,540	45 50 46 48	D D B	15 12 4 33
#1 #3 #1 #2 #3 #3	KNOX KNOX KNOX KNOX KNOX KNOX KNOX KNOX		14,900 16,140 49,170 322,060 13,160 39,240 6,750 6,750 6,750 5,720 9,880 10,100 7,690 14,750 45,770 6,530 38,620 14,750 45,770 6,530 38,620 26,930 9,020	70 56 65 665 58 605 58 607 408 31 336 48 41 47 806 68 76 52 86 76	000000000000000000000000000000000000000	31 18 53 2782 12 12 15 15 66 77 10 13 96 9 17 22 55 19 4 21 33 4 10
METRO TOTAL DMA TOTAL NSI AREA TOT #1 = LOUISVI #3 = TERRE H	LLE	#2 =	488,360 895,790 1,157,150 LAFAYETTE	62 31 62 , IN		431 828 1,434

#3 = TERRE HAUTE
NOTE: VIEWING IN ADJACENT DMA'S IS NOT LIMITED TO NSI AREA COUNTIES IN
TABLE 5. THE ABOVE LIST OF COUNTIES DOES NOT NECESSARILY REPRESENT
ENTIRE AREA FOR WHICH VIEWING OCCURS TO STATIONS IN THIS MARKET.
SEE INSIDE BACK COVER FOR FURTHER STATION TOTAL AREA DESCRIPTION.

Initially, approximately 51% of the predesignated Indianapolis DMA basic meter sample households are recruited and installed. For a typical report period, approximately 39% of the installed in eter sample are predesignated households.

^{* =} NSI Client | 1 = Independent Station | IF = Independent-Fox Network Affiliate | IS = Independent-Subscription TV Station | T = Turner Broadcasting System | T = Turner Broadcasting System | P = Educational and Public Broadcasting Service Stations | P-C = Public Broadcasting-Commercial Network affiliation as shown herein is based on information supplied by the networks for use in Niglsen Television Index (NTI). For additional details, see the NSI Reference Supplement.

^{*} See NSI Reference Supplement for explanation of MRS Territory and County Size